

## COMPENDIUM OF PLAINTIFF DECLARATIONS

<b>Tab No.</b>	<b>Plaintiff Declaration</b>
1	Declaration of Ralph Ashe
2	Declaration of Lyla Boone
3	Declaration of Jill Burke
4	Declaration of Mark Cook
5	Declaration of Rich Demski
6	Declaration of Marcia Figueroa
7	Declaration of Michael Franko
8	Declaration of Glenn Grosso
9	Declaration of Lori Grosso
10	Declaration of Cheryl Harder
11	Declaration of Jason and Gina Harper
12	Declaration of Cristen Irving
13	Declaration of Cindy Launch
14	Declaration of Edward Manzello
15	Declaration of Jill Olejniczak
16	Declaration of Amy Quinn
17	Declaration of Richard Quinn
18	Declaration of Kim Scalise
19	Declaration of Ann Trethewey
20	Declaration of Carolyn Zimmerman
21	Declaration of Jonathan Zimmerman

**TAB 1**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :

---

DECLARATION OF PLAINTIFF RALPH ASHE IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, RALPH ASHE, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a New Jersey sub-class as defined in the Consolidated Amended Complaint.
3. On or about October 23, 2005 I purchased an LG WM2077CW washing machine from Home Depot in Cherry Hill, New Jersey and took delivery of the washing machine on or about October 30, 2005. I paid approximately \$999.99 for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Approximately six months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household, and for no other purpose.

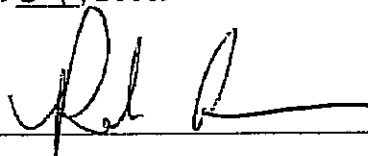
6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On March 11, 2010, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of New Jersey and the United States that the foregoing is true and correct, and that this Declaration was executed in City of WEST DEPTFORD

GLOUCESTER County, New Jersey on March 24, 2011.

  
\_\_\_\_\_  
Ralph Ashe

**TAB 2**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF LYLA BOONE IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Lyla Boone, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a California sub-class as defined in the Consolidated Amended Complaint.
3. In or about December 2005, I purchased an LG WM2277WH washing machine from Best Buy in Redding, California and took delivery of the washing machine on January 2, 2006. I paid approximately \$1,400.00 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Six or seven months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. Shortly after that, I began to see mold and mildew and/or biofilm in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household,

and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On December 1, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Redding Shasta County, California on March 28, 2011.



Lyla Boone

**TAB 3**



IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF JILL BURKE IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Jill Burke, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a New York sub-class as defined in the Consolidated Amended Complaint.
3. On or about May 24, 2005, I purchased a LG WM227HW washing machine from P.C. Richards in Patchogue, New York, and took delivery of the washing machine on May 25, 2005. I paid approximately \$859.99 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Several months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. In approximately February 2007, I began to see mold and mildew and/or biofilm in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.

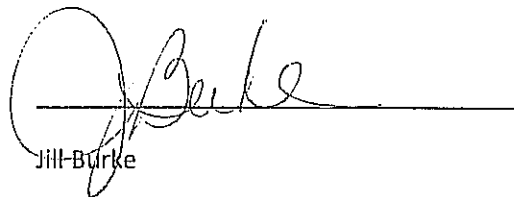
5. My washing machine has only been used for washing laundry in my household, and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On April 12, 2010, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of New York and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Manorville, Suffolk County, New York, on March 26, 2011.

  
Jill Burke

**TAB 4**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF MARK COOK IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Mark Cook, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Colorado sub-class as defined in the Consolidated Amended Complaint.
3. In or about November 2007, I purchased an LG Tromm Steam washing machine from Home Depot in Colorado and took delivery of the washing machine on December 6, 2007. I paid approximately \$1,300.00 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Several months after purchase, I first began to experience mold/mildew odor problems in the washing machine. In February 2008, I began to experience mold/mildew odor problems in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew odor problems.
5. My washing machine has only been used for washing laundry in my household,

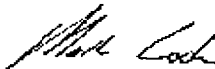
and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On December 9, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Colorado and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Lakewood, Jefferson County, Colorado on March 29, 2011.



---

Mark Cook

**TAB 5**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF RICH DEMSKI IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, RICH DEMSKI, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Florida sub-class as defined in the Consolidated Amended Complaint.
3. On or about August 19, 2006 I purchased an LG WM2277HW washing machine from Best Buy in Appleton, Wisconsin and took delivery of the washing machine on or about September 2, 2006. I paid approximately \$899.99 plus tax for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Within the first few months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household,

and for no other purpose.


6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On November 24, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Florida and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Bradenton,

MANATEE County, Florida on March 15, 2011.

A handwritten signature in black ink, appearing to read "Rich Demski", is written over a horizontal line.

Rich Demski



**TAB 6**

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF MARCIA FIGUEROA IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, MARCIA FIGUEROA, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a New York sub-class as defined in the Consolidated Amended Complaint.
3. On or about February of 2005 I purchased a WM2032HW washing machine from PC Richards in Long Island, New York and took delivery of the washing machine shortly thereafter. I paid approximately \$600 for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Within eight months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household,

and for no other purpose.

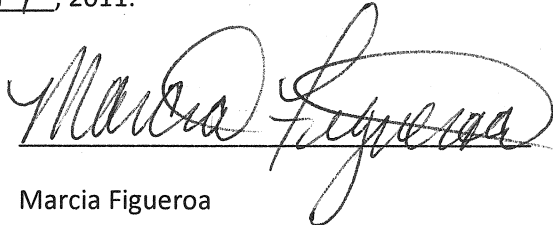
6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On November 11, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of New York and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Brooklyn

Kings County, New York on March 14, 2011.

  
Marcia Figueroa

**TAB 7**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF MICHAEL FRANKO IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, MICHAEL FRANKO, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for an Ohio sub-class as defined in the Consolidated Amended Complaint.
3. On or about June, 2006, I purchased a LG WM20077CW washing machine from Home Depot in Brunswick, Ohio , and took delivery of the washing machine. I paid approximately \$899.00 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Several months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. Within two to six months, I began to see mold and mildew and/or biofilm in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household,

and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On December 3, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Ohio, and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Broadview Heights

Cuyahoga County, Ohio, on March 22, 2011.



MICHAEL FRANKO

**TAB 8**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF GLEN GROSSO IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Glen Grosso, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Michigan sub-class as defined in the Consolidated Amended Complaint.
3. On or about July 19, 2006, I purchased a LG WM1812CW washing machine from Best Buy in Roseville, Michigan and took delivery of the washing machine on July 22, 2006. I paid approximately \$799.99 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Two to three months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. In late September or October of 2006, I began to see mold and mildew and/or biofilm in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.



5. My washing machine has only been used for washing laundry in my household, and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On November 23, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Michigan and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Grosse Pointe Woods

Wayne County, Michigan on March 21, 2011.

A handwritten signature in black ink, appearing to read 'Glen Grosso', written over a horizontal line.

Glen Grosso

**TAB 9**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF LORI GROSSO IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Lori Grosso, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Michigan sub-class as defined in the Consolidated Amended Complaint.
3. On or about July 19, 2006, I purchased an LG WM1812CW washing machine from Best Buy in Roseville, Michigan and took delivery of the washing machine on July 22, 2006. I paid approximately \$799.99 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Two to three months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. Around the same time, I began to see mold and mildew and/or biofilm in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.

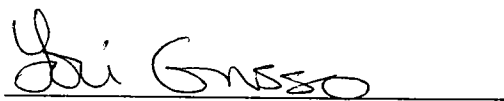
5. My washing machine has only been used for washing laundry in my household, and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On November 23, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Michigan and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Grosse Pointe Woods Wayne County, Michigan on March 21, 2011.

A handwritten signature in black ink, appearing to read "Lori Grosso", written over a horizontal line.

Lori Grosso

**TAB 10**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :

---

DECLARATION OF PLAINTIFF CHERYL HARDER IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, CHERYL HARDER, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for an Ohio sub-class as defined in the Consolidated Amended Complaint.
3. On or about May 6, 2007, I purchased an LG WM2277HW washing machine from Best Buy in Cincinnati, Ohio and took delivery of the washing machine shortly thereafter. I paid approximately \$752.37 for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Approximately two to three months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household,

and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On May 6, 2010, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Ohio and the United States that the foregoing is true and correct, and that this Declaration was executed in City of

Cincinnati

Clermont County, Ohio on March 24, 2011.

Cheryl Harder  
Cheryl Harder



**TAB 11**

## IN THE UNITED STATES DISTRICT COURT

## DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFFS JASON AND GINA HARPER IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

We, JASON AND GINA HARPER, declare as follows:

1. We are adult individuals and have personal knowledge of the facts in this Declaration and are competent to testify to these facts.
2. We are two of the named Plaintiffs in the referenced action, and proposed class representatives for a Florida sub-class as defined in the Consolidated Amended Complaint.
3. On or about April 25, 2006 we purchased an LG WM2277HS washing machine from The Home Depot in Daytona Beach, Florida and took delivery of the washing machine shortly thereafter. We paid approximately \$1014.82 for the washing machine. We purchased it in part because it was advertised as an efficient appliance. When we purchased our machine, we fully expected that it would be capable of cleaning our laundry.
4. Approximately four months after purchase, we first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. At the time we bought our machine, we did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. Our washing machine has only been used for washing laundry in our household, and for no other purpose.

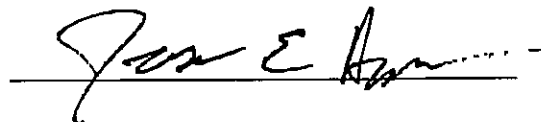
6. We volunteered to serve as a class representatives in this case because we purchased our washing machine without knowing that it would experience mold, odor and/or biofilm problems, and we believe it is wrong that we paid for a defective machine. Had we known about the mold, odor and/or biofilm problems, we would not have purchased the machine or would have paid less for the machine. In addition, as customers who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, we want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining our attorneys, we have actively participated in this case. We read the original complaint in the case before it was filed, and also read the consolidated complaint before it was filed. We have provided information and documents to our attorneys in response to LG's interrogatories and requests for documents. On November 23, 2009, we were deposed by an attorney representing LG in this case. Additionally, our home and washing machine were inspected by LG.

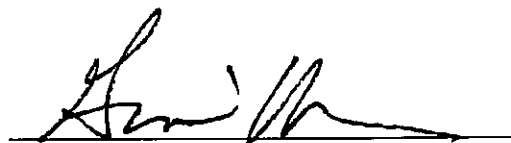
8. We understand that as class representatives, We have an obligation to act in the best interests of other class members and will do that to the best of our ability. If necessary, we will testify at trial. we do not have any interests that conflict with the interests of other class members. We have actively and diligently participated in this action in cooperation with our attorneys, and will continue to do so.

We declare under penalty of perjury of the laws of the State of Florida and the United States that the foregoing is true and correct, and that this Declaration was executed in City of St. Petersburg,

Pinellas County, Florida on March 29, 2011.



Jason Harper



Gina Harper

**TAB 12**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF CRISTEN IRVING IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, CRISTEN IRVING, declare as follows:

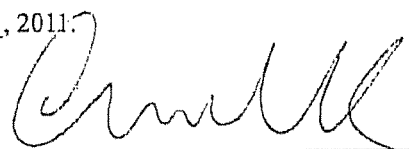
1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Connecticut sub-class as defined in the Consolidated Amended Complaint.
3. On or about July 23, 2006 I purchased an LG WM2077CW washing machine from Home Depot in Danbury, Connecticut and took delivery of the washing machine shortly thereafter. I paid approximately \$809.10 for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Approximately six months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household, and for no other purpose.
6. I volunteered to serve as a class representative in this case because I purchased my

washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On November 24, 2009, I was deposed by an attorney representing LG in this case.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Connecticut and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Ridgefield  
Fairfield County, Connecticut on March 15, 2011.

  
Cristen Irving

**TAB 13**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF CINDY LAUNCH IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Cindy Launch, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Florida sub-class as defined in the Consolidated Amended Complaint.
3. On or about June 29, 2006, I purchased a LG WM227HS washing machine from Home Depot in Destin, Florida and took delivery of the washing machine on July 1, 2006. I paid approximately \$1,000.00 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Several months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. In January 2008, I began to see mold and mildew and/or biofilm in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household,



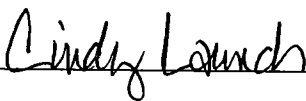
and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On December 1, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Florida and the United States that the foregoing is true and correct, and that this Declaration was executed in City of ~~SANTA ROSA BEACH~~ WALTON County, Florida on March 20, 2011.

  
Cindy Launch

**TAB 14**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF EDWARD MANZELLO IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, EDWARD MANZELLO, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Florida sub-class as defined in the Consolidated Amended Complaint.
3. On or about September 29, 2006, I purchased a LG WM2688HM washing machine from P.C Richards in Deer Park, Long Island, New York, and took delivery of the washing machine in October, 2006. I paid approximately \$1,200 - \$1,500 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Several months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. Around December, 2006 I began to see mold and mildew and/or biofilm in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household,

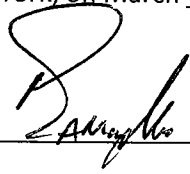
and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On December 22, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of New York and the United States that the foregoing is true and correct, and that this Declaration was executed in City of SHOREHAM, SUFFOLK County, New York, on March 18, 2011.

  
\_\_\_\_\_  
EDWARD MANZELLO

**TAB 15**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF JILL OLEJNICZAK IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Jill Olejniczak, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Texas sub-class as defined in the Consolidated Amended Complaint.
3. On or about January 22, 2006, I purchased an LG WM2077CW washing machine from Home Depot in Katy, Texas and took delivery of the washing machine on January 26, 2006. I paid approximately \$949.00 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Three to four months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. In January 2007, I began to see mold and mildew and/or biofilm in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household,

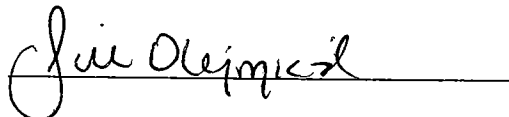
and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On December 16, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Texas and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Fulshear, Fort Bend County, Texas on March 20, 2011.

  
Jill Olejniczak

**TAB 16**



IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF AMY QUINN IN  
SUPPORT OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Amy Quinn, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a South Carolina sub-class as defined in the Consolidated Amended Complaint.
3. On or about December 2005, I purchased a LG model washing machine from Best Buy in South Carolina, and took delivery of the washing machine in January 2006. I paid approximately \$1,100.00 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient and reliable appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Several months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. In January 2008, I began to see mold and mildew and/or biofilm in the machine. At

the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.

5. My washing machine has only been used for washing laundry in my household, and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.


7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On December 8, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class

members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of South Carolina and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Wayce, Lexington County, South Carolina, on March 23, 2011.

  
\_\_\_\_\_  
Amy Quinn

  
\_\_\_\_\_  
(SEAL)  
Notary Public for South Carolina  
My commission expires: 10/25/20

**TAB 17**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF RICHARD QUINN IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Richard Quinn, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a South Carolina sub-class as defined in the Consolidated Amended Complaint.
3. On or about December 2005, my wife Amy Quinn and I purchased a LG model washing machine from Best Buy in South Carolina, and took delivery of the washing machine in January 2006. We paid approximately \$1,100.00 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient and reliable appliance. When we purchased the machine, I fully expected that it would be capable of cleaning my laundry.
4. Several months after purchase, I first began to experience mold and mildew and/or

biofilm accumulation in the washing machine and to experience mold/mildew odor problems. In January 2008, I began to see mold and mildew and/or biofilm in the machine. At the time we bought the machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.

5. My washing machine has only been used for washing laundry in my household, and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.


7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On December 8, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.


8. I understand that as class representative, I have an obligation to act in the best



interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of South Carolina and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Cayce, Lexington County, South Carolina, on March 23, 2011.

  
Richard Quinn

  
\_\_\_\_\_(SEAL)  
Notary Public for South Carolina  
My commission expires: 10/25/20

**TAB 18**



IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF KIMBERLY SCALISE IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, Kimberly Scalise, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for an Illinois sub-class as defined in the Consolidated Amended Complaint.
3. On or about June 29, <sup>2005</sup>~~2006~~, I purchased a LG model WM0532HW washing machine from Best Buy in Crystal Lake, Illinois, and took delivery of the washing machine in July 2005. I paid approximately \$1,049.99 (plus delivery charges) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Several months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. In January 2008, I began to see mold and mildew and/or biofilm in the machine. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.
5. My washing machine has only been used for washing laundry in my household,

and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On March 5, 2010, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Illinois and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Crystal Lake,

McHenry County, Illinois, on March 21, 2011.

Christina A Walker

3/21/11

Kimberly Scalise

Kimberly Scalise



**TAB 19**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF ANN TRETHEWEY IN SUPPORT  
OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, ANN TRETHEWEY, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Pennsylvania sub-class as defined in the Consolidated Amended Complaint.
3. On or about October 6, 2007 I purchased an LG WM2496HSM washing machine from Home Depot in Downingtown, Pennsylvania and took delivery of the washing machine on or about October 11, 2007. I paid approximately \$989.10 plus tax plus a \$55 delivery fee for the washing machine. I also purchased a 4 year extended warranty plan for approximately \$89.99. I purchased it in part because it was advertised as an efficient appliance. When I purchased my machine, I fully expected that it would be capable of cleaning my laundry.
4. Approximately three months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. At the time I bought my machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.

5. My washing machine has only been used for washing laundry in my household, and for no other purpose.

6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On December 3, 2009, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of Pennsylvania and the United States that the foregoing is true and correct, and that this Declaration was executed in City of Dormont

Chester County, Pennsylvania on March 14, 2011.

  
Ann Trethewey

**TAB 20**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF CAROLYN ZIMMERMAN  
IN SUPPORT OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, CAROLYN ZIMMERMAN, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.
2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Florida sub-class as defined in the Consolidated Amended Complaint.
3. On or about December 8, 2006, Jonathan Zimmerman and I purchased a LG WM2277HW washing machine from Best Buy in North Carolina, and took delivery of the washing machine on December 10, 2006. We paid approximately \$800.91 (plus tax) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased the machine, I fully expected that it would be capable of cleaning my laundry.
4. Several months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. In #DATE, I began to see mold and mildew and/or biofilm in the machine. At the time I bought the machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.

5. The washing machine has only been used for washing laundry in my household, and for no other purpose.

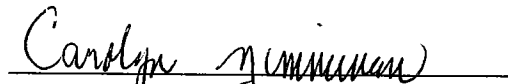
6. I volunteered to serve as a class representative in this case because I purchased my washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On February 25, 2010, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of North Carolina, and the United States that the foregoing is true and correct, and that this Declaration was executed in City of

Hickory, Catawba County, North Carolina, on March 21, 2011.

  
CAROLYN ZIMMERMAN



**TAB 21**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE LG FRONT LOAD WASHING :  
MACHINE CLASS ACTION : Case No. 2:08-cv-00051-FSH-MAS  
LITIGATION :  
\_\_\_\_\_ :

DECLARATION OF PLAINTIFF JONATHAN ZIMMERMAN  
IN SUPPORT OF PLAINTIFFS' MOTION TO CERTIFY A CLASS

I, JONATHAN ZIMMERMAN, declare as follows:

1. I am an adult individual. I have personal knowledge of the facts in this Declaration and am competent to testify to these facts.

2. I am one of the named Plaintiffs in the referenced action, and a proposed class representative for a Florida sub-class as defined in the Consolidated Amended Complaint.

3. On or about December 8, 2006, Carolyn Zimmerman and I purchased a LG WM2277HW washing machine from Best Buy in North Carolina , and took delivery of the washing machine on December 10, 2006. We paid approximately \$800.91 (plus tax) for the washing machine. I purchased it in part because it was advertised as an efficient appliance. When I purchased the machine, I fully expected that it would be capable of cleaning my laundry.

4. Several months after purchase, I first began to experience mold and mildew and/or biofilm accumulation in the washing machine and to experience mold/mildew odor problems. In #DATE, I began to see mold and mildew and/or biofilm in the machine. At the time I bought the machine, I did not know that it would experience mold/mildew and/or biofilm and odor problems.

5. The washing machine has only been used for washing laundry in my household, and for no other purpose.

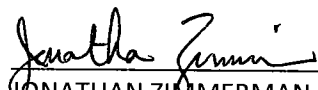
6. I volunteered to serve as a class representative in this case because I purchased the washing machine without knowing that it would experience mold, odor and/or biofilm problems, and I believe it is wrong that I paid for a defective machine. Had I known about the mold, odor and/or biofilm problems, I would not have purchased the machine or would have paid less for the machine. In addition, as a customer who purchased a washing machine without knowledge of the mold, odor and/or biofilm problems it causes, I want other LG customers to have complete and truthful information about LG's washing machines and the mold, odor and/or biofilm problems the machines experience.

7. Since retaining my attorneys, I have actively participated in this case. I read the original complaint in my case before it was filed, and also read the consolidated complaint before it was filed. I have provided information and documents to my attorneys in response to LG's interrogatories and requests for documents. On February 25, 2010, I was deposed by an attorney representing LG in this case. Additionally, my home and washing machine were inspected by LG.

8. I understand that as class representative, I have an obligation to act in the best interests of other class members and will do that to the best of my ability. If necessary, I will testify at trial. I do not have any interests that conflict with the interests of other class members. I have actively and diligently participated in this action in cooperation with my attorneys, and will continue to do so.

I declare under penalty of perjury of the laws of the State of North Carolina, and the United States that the foregoing is true and correct, and that this Declaration was executed in City of

Hickory, Catawba County, North Carolina, on March 21, 2011.

  
\_\_\_\_\_  
JONATHAN ZIMMERMAN